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15 Attorneys for Defendant,  
16 FRONTIER AIRLINES, INC.

17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 ANNE HEITING, an individual,  
20  
21 Plaintiff,

22 vs.

23 FRONTIER AIRLINES, INC., a  
24 Colorado corporation; DOES 1 through  
25 25, inclusive,

26 Defendants.

CASE NO. 2:25-cv-01375 SPG (PDx)  
[Assigned to Hon. Sherilyn Peace Garnett]

**STIPULATION TO EXTEND  
DEFENDANT FRONTIER AIRLINES,  
INC.'S DEADLINE TO FILE ITS  
RESPONSIVE PLEADING**

27 IT IS HEREBY STIPULATED and AGREED by and between Plaintiff  
28 Anne Heiting ("Plaintiff") and Defendant Frontier Airlines, Inc. ("Defendant"),  
subject to the Court's approval, that Defendant's deadline to file its responsive  
pleading shall be extended 30 days, or until March 27, 2025. In support of this  
stipulation, the parties hereto state as follows:

1           1.     On January 15, 2025, Plaintiff Anne Heiting (hereinafter “Plaintiff”)  
 2 commenced an action (the “Complaint”) in the Superior Court of California,  
 3 County of Los Angeles, captioned *Anne Heiting v. Frontier Airlines, Inc.*, Case No.  
 4 25STCV01092. Plaintiff asserted a cause of action under the “Trap and Trace  
 5 Law” provision of the California Invasion of Privacy Act (“CIPA”), codified in Cal.  
 6 Penal Code 630, et. seq.

7           2.     On February 18, 2025, Defendant removed Plaintiff’s state court action  
 8 to the United States District Court for the Central District of California.

9           3.     Pursuant to Fed. R. Civ. P. 81(c), Defendant’s deadline to file a  
 10 responsive pleading is seven (7) days after the notice of removal is filed, or, in this  
 11 case, February 25, 2025.

12           4.     The parties wish to extend Defendant’s deadline to file its responsive  
 13 pleading in order to enhance the prospect of successful settlement discussions,  
 14 which are currently underway.

15           5.     Accordingly, the parties to this stipulation respectfully request that the  
 16 Court approve the stipulation and enter the proposed order submitted herewith.

17 DATED: February 25, 2025

Respectfully submitted,

18 TAULER SMITH LLP

19 /s/ Robert Tauler

20 Robert Tauler

21 Wendy Miele

22 Camrie Ventry

Attorneys for Plaintiff, Anne Heiting

23 FITZPATRICK, HUNT & PAGANO, LLP

24 /s/ Doug Griffith

25 Doug Griffith

26 Brian T. Maye (*Pro Hac Vice* pending)

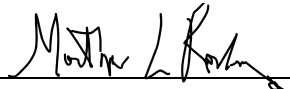
27 Edward Tarolli

Attorneys for Defendant,

28 Frontier Airlines, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25<sup>th</sup> day of February 2025, a copy of the foregoing document was electronically filed with the Clerk of the Court at USDC, Central District of California, using CM/ECF system, which will send notification of such filing to all parties in this action.

  
\_\_\_\_\_  
Martha L. Rodriguez